

Exhibit 2

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

CONNECTICUT GENERAL LIFE
INSURANCE COMPANY AND
CIGNA HEALTH AND LIFE
INSURANCE COMPANY

Plaintiff,

VS.

HUMBLE SURGICAL HOSPITAL, LLC

Defendant.

[illegible]

JURY DEMANDED

CIVIL ACTION NO.: 4:13-CV-3291

DECLARATION OF JACK O'NEILL IN SUPPORT OF
HUMBLE SURGICAL HOSPITAL, LLC'S
MOTION FOR ATTORNEY'S FEES

I, Edward John ("Jack") O'Neill, Jr. declare as follows:

1. I am a partner at Pierce & O'Neill, L.L.P. ("Pierce & O'Neill") and prior counsel for Defendant Humble Surgical Hospital, LLC ("Humble") in the above-captioned matter. I submit this Declaration in support of Humble's Motion for Attorney's Fees in connection with services rendered in this matter.

2. The factual matters set forth and the assertions made herein are true and correct to the best of my knowledge, information, and belief.

3. Humble retained Pierce & O'Neill as counsel in this case and also in another case filed by Andrews Kurth on behalf of Aetna. Pierce & O'Neill began working on this matter in March 2014. Pierce & O'Neill withdrew from the representation in April 2015 when Susman Godfrey returned as counsel for Humble. Doc. 73.

4. Humble seeks reimbursement of Susman Godfrey's and Pierce & O'Neill's attorney's fees in the amount of \$2,743,790.25. Of that, \$490,286.00 is attributable to work by

Pierce & O'Neill. The following chart provides a timekeeper-by-timekeeper summary of the hours expended, average hourly rates, and total time value for each of the Pierce & O'Neill timekeepers who billed to this matter. The data in the chart below are current through March 21, 2016:

Timekeeper	Hours Worked	Average Hourly Rate	Time Value
Jack O'Neill	137.40	\$550.00	\$75,570.00
Scott R. Humphrey	424.10	\$390.00	\$165,399.00
Brian J. Cathey	191.80	\$325.00	\$62,335.00
Thomas J. Adair	67.10	\$375.00	\$25,162.50
Courtney E. Hawkins	46.10	\$365.00	\$16,826.50
John C. Schwambach	12.10	\$390.00	\$4,719.00
Souad Hijazi	733.90	\$180.00	\$132,102.00
Tyler W. Luke	56.30	\$90.00	\$5,067.00
Diana G. Platt	15.50	\$180.00	\$2,790.00
Justin R. Luke	3.50	\$90.00	\$315.00
Totals	1,687.80	\$290.50	\$490,286.00

5. This chart was prepared from contemporaneous daily time records regularly prepared and maintained by Pierce & O'Neill. Those records are available for submission to the Court for *in camera* review. The billing rate listed for each individual is the average hourly rate for all time spent by that individual in that phase. The hourly rates used in the preparation of the above chart are the usual and customary hourly rates charged for the services of the partners, associates and staff.

6. I have personally supervised all aspects of the case during the time of Pierce & O'Neill's representation of Humble.

7. All of the work performed by Pierce & O'Neill attorneys and staff was performed at my direction. All work was performed efficiently and economically and in order to avoid unnecessary expenditures of time and expense.

8. I was primarily assisted by my associates Scott Humphrey and Courtney Hawkins. These three attorneys (myself included) account for 38% of the total hours spent by Pierce & O'Neill on this matter and 52% of the time value of fees for the services performed by Pierce & O'Neill on this matter.

9. I participated in all aspects of this case during the representation of Humble, including pre-suit and discovery. I am a graduate of the University of Texas School of Law. I have exclusively practiced complex commercial litigation for the past 43 years. My average hourly rate for time spent working on this matter is \$550.00. I spent a total of 137.40 hours working on the case. A copy of my resume is attached as Exhibit A to this Declaration.

10. Mr. Humphrey is an associate at Pierce & O'Neill, and a *magna cum laude* graduate of the University of Houston Law Center. Mr. Humphrey has over 13 years of experience litigating complex commercial disputes, preparing such cases for trial, and trying those cases. He participated in all aspects of this case during the representation of Humble. Mr. Humphrey spent 424.10 hours working on this case at an average hourly rate of \$390.00. A copy of his resume is attached as Exhibit B to this Declaration.

11. Mr. Cathey was formerly an associate at Pierce & O'Neill and a graduate of the University of Michigan Law School. Mr. Cathey had several years of experience at our firm litigating complex commercial disputes and preparing such cases for trial. He participated in all aspects of this case during the representation of Humble. Mr. Cathey spent 191.80 hours working on this case at an average hourly rate of \$325.00.

12. Mr. Adair is an associate at Pierce & O'Neill and a graduate of the University of Texas School of Law the University of Houston Law Center. Mr. Adair has nearly 10 years of experience litigating complex commercial disputes and preparing such cases for trial. He participated in all aspects of this case during the representation of Humble. Mr. Adair spent 67.10 hours working on this case at an average hourly rate of \$375.00. A copy of his resume is attached as Exhibit C to this Declaration.


13. Ms. Hawkins is an associate at Pierce & O'Neill, a graduate of the University of Texas School of Law, and a former law clerk to Judge Lee H. Rosenthal of the United States District Court for the Southern District of Texas. Ms. Hawkins has over 10 years of experience litigating complex commercial disputes and preparing such cases for trial. She participated in all aspects of this case during the representation of Humble. Ms. Hawkins spent 46.10 hours working on this case at an average hourly rate of \$365.00. A copy of her resume is attached as Exhibit D to this Declaration.

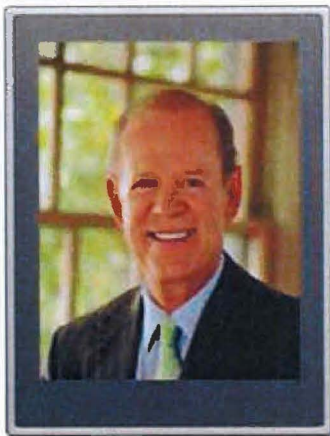
14. Ms. Hijazi was formerly a paralegal with Pierce & O'Neill with many years of experience working at firms practicing commercial litigation. Ms. Hijazi spent 733.90 hours working on this case; her average hourly rate for time spent on this matter is \$180.00.

15. Pierce & O'Neill represented Humble on hourly or fixed monthly fee agreements until April 2015. By representing Humble in this matter, my team and I were forced to forego other work or set that work aside in order to execute our responsibilities in this case.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 23rd day of March, 2016.


Edward John ("Jack") O'Neill, Jr.



Jack O'Neill

713-634-3638 direct
713-817-7899 cell
JONeill@pierceneill.com
[Download vCard](#)
[Download CV](#)

BIOGRAPHY

Jack O'Neill has been trying large complex cases for over 42 years. His experience in the courtroom involves many cases that have been widely publicized. Mr. O'Neill was co-trial counsel for UPR, Inc. in its attempted takeover of Pennzoil. He was lead counsel for Mitchell Energy Corporation in the company's effort to overturn a \$204 million judgment rendered against the company in a case tried for the company by another law firm. On appeal, argued by Mr. O'Neill, the case was reversed in its entirety and judgment was rendered in favor of Mitchell. He was lead trial counsel for Mitchell Energy in a related case in which plaintiffs sought \$750 million for alleged contamination of their properties by natural gas and hydrogen sulfide. After a three-month trial, the jury rendered a unanimous verdict in favor of Mitchell. He was lead trial counsel for plaintiffs in the highly publicized Key 1-11 gas well blowout case in the Texas Panhandle, the largest blowout of a gas well in continental United States history. After a trial lasting over two and a half months, the jury returned one of the largest verdicts in Randall County, Texas history in favor of Mr. O'Neill's clients. He was lead trial counsel for a well-known Houston oil and gas company in a fraud case in which the plaintiff sought damages in excess of \$100 million. After a two-month trial, the jury returned a verdict for Mr. O'Neill's client, and a take-nothing judgment was entered by the trial court. Mr. O'Neill has successfully tried many other cases relating to virtually all aspects of the oil and gas industry.

Mr. O'Neill's trial experience is not confined to oil and gas matters. He successfully defended GE in the "Desert Storm" Ramstein Air Base C-5A crash litigation. As co-counsel, he successfully defended GE in the trial court and before the Fifth Circuit and the United States Supreme Court in the U.S.S. Stark litigation, emanating out of the attack on the Stark in the Persian Gulf by an Iraqi fighter jet. He successfully defended Eastman Kodak Company in its mini-lab class action case, involving alleged damages of \$3 billion. Mr. O'Neill was lead counsel for plaintiffs in a suit against an American subsidiary of a foreign trading company for employment discrimination against American citizens, which established in the district court and United States Supreme Court that American subsidiaries of foreign companies are not immune from United States fair employment laws. He has obtained a multimillion-dollar jury verdict for an equipment manufacturer in an unfair competition and theft of trade secrets case. As lead trial counsel, he successfully defended McKesson Corporation by obtaining a unanimous jury verdict in a trademark infringement trial in which the plaintiff sought damages in excess of \$1 billion. As lead arbitration counsel, he successfully procured a unanimous arbitration opinion in favor of Weatherford International, Inc., granting Weatherford specific performance of a contract to convey computer software, denying in its entirety the defendant's counterclaim of over \$100 million, and awarding Weatherford its attorney fees and expenses. He has also successfully defended a toy manufacturer in a trademark infringement trial. He has successfully defended a former United States Senator in litigation filed against a major United States company and its directors.

Mr. O'Neill has won numerous jury verdicts in cases involving allegations of breach of contract, negligence and gross negligence, trademark infringement, unfair competition, fraud, environmental contamination and strict liability. Over the years, his clients have included Exxon Mobil Corporation, UNOCAL, Koch Industries, Stewart & Stevenson Services, The Williams Companies, GE, Eastman Kodak Company, INVISTA, Anadarko Petroleum Corporation, The John Wood Group, CNA, Transcontinental Gas Pipe Line Corporation, Mitchell Energy & Development Corp., Devon Energy Corporation, McKesson Corporation, Weatherford International and many other Fortune 500 companies.

Mr. O'Neill is a former director of the Litigation Section of the State Bar of Texas. He is a member of the American Board of Trial Advocates. He is also a member of the International Association of Defense Counsel.

REPRESENTATIVE EXPERIENCE

- Union Pacific Resources Group, Inc. and Resources Newco, Inc. v. Pennzoil Co. United States District Court, Northern District of Texas, Fort Worth Division. Co-trial counsel for UPR in tender offer for Pennzoil.
- Horizon Radiology, P.A. v. McKesson Corporation and McKesson Information Solutions, LLC. United States District Court, Southern District of Texas, Houston Division. Lead trial counsel in successful defense of \$1 billion-plus trade mark infringement case. Unanimous jury verdict for defendants.
- Weatherford International, Inc. v. Intelligent Agent Corporation. International Centre for Dispute Resolution. Award of specific performance in favor of Weatherford, denial of defendant's counterclaim of over \$100 million, and award of attorney fees and expenses to Weatherford.
- Carol R. Bailey v. Mitchell Energy Corporation. 271st District Court, Wise County, Texas. Lead trial counsel in successful defense of \$750 million environmental contamination case. Following three-month trial, unanimous jury verdict for defendant. Take-nothing judgment entered against plaintiffs.
- Mitchell Energy Corporation v. Bartlett. Court of Appeals for the Second District of Texas at Fort Worth. Reversal and rendition in client's favor of \$204 million jury verdict in case tried by another law firm.
- Carol Bailey v. Mitchell Energy Corporation. Court of Appeals for the Second District of Texas at Fort Worth. Affirmance of take-nothing judgment entered by trial court in \$750,000,000 environmental contamination case.
- Mitchell Energy Corporation v. Ashworth. Supreme Court of Texas. Leading Texas case on objections to assigned judges. Writ of mandamus granted and opinion issued upholding client's objection to assignment of former judge as trial judge.
- Susan Parrish Forney v. William H. Forney, Sr., et al. 312th District Court, Harris County, Texas. Jury verdict for defendant in \$100 million fraud case at conclusion of two-month trial.
- Susan Parrish Forney v. William H. Forney, Sr., et al. Court of Appeals for the First District of Texas at Houston. Affirmance on appeal of jury verdict for client in \$100 million fraud case.
- Arkla Exploration Co., et al. v. Apache Corporation, et al. v. Babcock & Wilcox Co., et al. 31st District Court, Wheeler County, Texas. Multimillion-dollar jury verdict for clients following two-and-a-half-month trial in case to determine cause of the largest blowout of a gas well in the continental United States history.
- Tom L. Scott, Inc. v. Hon. Granger W. McIlhany. Supreme Court of Texas. Writ of mandamus granted and opinion issued in favor of clients, holding that experts originally designated as

testifying experts could not be redesignated as consulting experts to avoid discovery of experts' opinions and mental impressions.

- John Wood Group USA, Inc., et al. v. ICO, Inc. Court of Appeals for the First District of Texas at Houston. Opinion issued by appellate court in favor of client, holding that memorandum of understanding was unambiguous and nonbinding as a matter of law.
- In Re Air Disaster at Ramstein Air Base, Germany; Olga Perez, et al. v. Lockheed Corporation and General Electric Company; Judy Gordon v. Lockheed Corporation and General Electric Company. Successful defense in trial court of manufacturer of engines on C-5A transport aircraft that crashed in support of operation Desert Storm.
- In Re Air Disaster at Ramstein Air Base, Germany. United States Court of Appeals, Fifth Circuit. Affirmance of successful defense in trial court of Ramstein Air Base disaster case against aircraft engine manufacturer.
- Chevron USA, Inc. v. Santa Fe Snyder Corp., et al. United States Court of Appeals, Fifth Circuit. Reversal and rendition in clients' favor on appeal of judgment entered by district court in contract construction case handled in trial court by another law firm.
- The Game Peddler, Inc. v. US Game & Toy Co., d/b/a The Game Player. 269th District Court, Harris County, Texas. Successful defense of trademark infringement action.
- National Air Vibrator Co. v. American Precision Vibrator Co. 129th District Court, Harris County, Texas. Multimillion-dollar jury award and judgment for client in unfair competition and theft of trade secrets case.
- American Precision Vibrator Co. v. National Air Vibrator Co. Court of Appeals for the First District of Texas at Houston. Affirmance on appeal of judgment obtained in unfair competition and theft of trade secrets case.
- Tim Beverick v. Koch Power, Inc., et al. 133rd District Court, Harris County, Texas. Successful defense of multimillion-dollar breach of contract and fraud case brought by former employee against former employer.
- Louis Dreyfus Natural Gas Holdings Corp., et al. v. Anatoly Sverdlin. Court of Appeals for the First District of Texas at Houston. Co-counsel for defendants on appeal in successful reversal and rendition of trial court judgment in excess of \$200 million.
- Trans Chemical Ltd., et al. v. China National Machinery Import & Export Corp. United States Court of Appeals, Fifth Circuit. Opinion issued in client's favor, affirming denial of motion to intervene.
- Lawrence M. Bareford, et al. v. General Dynamics Corp., et al. United States District Court, Southern District of Texas, Galveston Division. Co-counsel in successful trial court defense of contractor in U.S.S. Stark litigation.
- Lawrence M. Bareford, et al. v. General Dynamics Corp., et al. United States Court of Appeals, Fifth Circuit. Successful affirmance on appeal of trial court judgment in favor of defense contractor in U.S.S. Stark litigation.
- Mike D. Lee d/b/a Mid-South Investment v. Wal-Mart Stores, Inc. United States District Court, Eastern District of Texas, Marshall Division. Unanimous multimillion-dollar jury verdict obtained as co-trial counsel for plaintiff in breach of fiduciary duty case.
- French Wallop v. El Paso Corporation, et al. 11th District Court, Harris County, Texas. Successful defense in trial court of former United States Senator in breach of contract and civil conspiracy case.
- Michael E. Spiess, et al. v. C. Itoh & Co. (America), Inc. United States District Court, Southern District of Texas, Houston Division. Obtained landmark opinion in favor of plaintiffs that United States incorporated subsidiaries of foreign companies are not immune from United States fair employment laws.

- Peter Pritchard v. First National Bank of Dona Ana County, Las Cruces, New Mexico. United States District Court, District of New Mexico. Verdict obtained for plaintiff in multimillion-dollar case against bank for negligence in honoring letter of credit.
- Harvard Interiors Mfg. Co v. Dickey Electric Co. United States District Court, Southern District of Texas, Houston Division. Verdict obtained for plaintiff in multimillion-dollar case arising out of installation of light fixtures in underground tunnel.
- McCormick Oil & Gas Co. v. American Exploration Drilling Program. 190th District Court, Harris County, Texas. Jury verdict obtained for plaintiff in multimillion-dollar directional drilling case.

PRACTICE AREAS

- Commercial Disputes Litigation
- Energy Litigation
- Trade Secrets and Non-Compete Litigation
- Appellate Litigation
- Environmental Litigation

EDUCATION

- J.D., University of Texas School of Law, 1972
- B.A., University of Pennsylvania, 1969, cum laude

AWARDS AND RECOGNITION

- Selected for inclusion in Texas Super Lawyers (a Thomson Reuters service) 2003 - 2011
- Martindale-Hubbell® "AV" Rating

MEMBERSHIPS

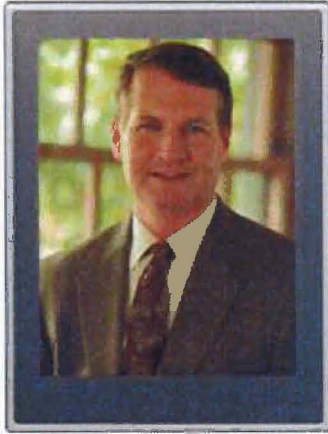
- State Bar of Texas Section of Litigation, Director, 1998 to 2000
- Houston Young Lawyers Association, Director, 1978 to 1979
- American Board of Trial Advocates, Member
- International Association of Defense Counsel, Member
- State Bar of Texas
- Texas Bar Foundation

PUBLICATIONS

- Author, "Legal Consequences and Ethical Implications of Physical Evidence Spoliation," Institute for Energy Law of the Center for American and International Law, 9th Annual Energy Litigation Conference, October 12, 2010
- Co-Author, "Valuation of Oil Royalties: From the Perspective of the Payor," 47 Institute on Oil & Gas Law, 7 TAX'N 6-1 (Matthew Bender, 1996)
- Co-Author, "Damages," 14 The Advocate 362 (1995)
- Co-Author, "Injunctive and Monetary Relief in Class Actions in the Fifth Circuit," State Bar of Texas Antitrust Business Litigation Section Report

COURT ADMISSIONS

- United States Supreme Court
- United States Court of Claims
- United States Court of Appeals for the Fifth Circuit
- United States Court of Appeals for the Eleventh Circuit
- United States District Court for the Southern District of Texas
- United States District Court for the Northern District of Texas
- United States District Court for the Eastern District of Texas
- United States District Court for the Western District of Texas
- United States Bankruptcy Court for the Southern District of Texas



Scott R. Humphrey

713-634-3611 direct
281-546-6423 cell
SHumphrey@pierceneill.com
[Download CV](#)

BIOGRAPHY

Scott R. Humphrey has over 10 years' experience defending a wide variety of clients in complex commercial, energy, toxic tort and environmental litigation. Mr. Humphrey has experience defending clients across a full range of commercial disputes, including allegations of fraud, breach of contract, antitrust violations and breach of fiduciary duty. He has also represented clients in investigations of commercial activities by federal regulatory agencies. Mr. Humphrey has particular experience representing and defending clients in the energy industry. He is also experienced in representing industrial clients in cases involving exposure to benzene and asbestos.

Before joining the firm, Mr. Humphrey worked in the Houston office of Baker Botts. Prior to his legal career, he worked for 14 years as a manager and principal consultant for a national environmental consulting firm.

REPRESENTATIVE EXPERIENCE

- Represented an independent oil and gas company against fraud and breach of fiduciary duty claims brought by investors, culminating in a five-week jury trial.
- Represented an international oilfield services company in a breach of contract arbitration proceeding.
- Represented an independent oil and gas producer in a \$50 million state court breach of contract action.
- Represented a venture capital company in a one-week arbitration proceeding related to the liquidation of an oil and gas royalty trust.
- Participated in the successful defense of a petroleum refining client in RCRA citizens suit action involving leaking underground storage tanks.
- Represented five oil and gas producers in a federal class action case brought by royalty owners.
- Represented an agricultural commodity company in two-week arbitration hearing for a breach of contract claim related to the sale of assets to another company.
- Successfully obtained a mandamus from the Texas Supreme Court of a trial judge's improper pretrial ruling in a toxic tort matter, closing a potential venue loophole for plaintiffs.
- Obtained a preliminary injunction in state court against a construction machinery dealer that was misappropriating a manufacturer's equipment.
- Defended a large energy company in a series of related state and federal class action lawsuits related to the 2000-2001 California energy crisis.

- Represented a large utility company in investigations brought by the FERC, CFTC, SEC and DOJ related to the 2000-2001 California energy crisis.

Coordinated the investigation of and responses to subpoenas related to these matters:

- Defended petroleum refining and chemical clients in approximately 100 toxic tort cases involving allegations of benzene exposure and other workplace injuries.
- Coordinated the investigation of alleged accounting misconduct for a large energy client, including the management of outside auditors and reporting to Board of Directors, resulting in \$20 million accounting restatement.

PRACTICE AREAS

- Commercial Disputes Litigation
- Energy Litigation
- Toxic Tort Litigation
- Environmental Litigation

EDUCATION

- J.D., Magna Cum Laude, University of Houston Law Center
- M.B.A., Southern Methodist University
- M.S., Texas A&M University
- B.S., Magna Cum Laude, Texas A&M University

AWARDS AND RECOGNITION

- Recognized by Law & Politics as a "Texas Rising Star" 2010-2011

MEMBERSHIPS

- State Bar of Texas
- Houston Bar Association

PUBLICATIONS

- The Assignment of Oil & Gas Leases: Conditions, Constraints and Consequences, Institute for Energy Law, 62nd Annual Oil & Gas Law Conference (Feb. 17, 2011) (co-author with Mark K. Glasser).
- "Environmental Citizen Suits — What to do when citizens try to take the place of the EPA," Baker Botts CLE Seminar Series - Legal Issues in Gas Exploration and Production, December 7, 2010.
- Drawing Lines: The D.C. Circuit Forces the EPA and Congress to Clean Up the Process of Setting Air Quality Standards in American Trucking Associations, Inc. v. EPA, 37 HOUS. L. REV. 839 (2000).

COURT ADMISSIONS

- Texas
- United States District Court for the Southern District of Texas
- United States District Court for the Eastern District of Texas



Thomas J. Adair

713-634-3622 direct
TAdair@pierceneill.com
[Download vCard](#)
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BIOGRAPHY

Tom Adair's practice focuses on complex commercial litigation, intellectual property matters, and oil and gas disputes. Mr. Adair has experience prosecuting and defending breach of contract, fraud, patent infringement, copyright, trademark, trade secret, and class action claims, among others. His experience ranges from large multi-party cases worth hundreds of millions of dollars to small claims in state and federal court, as well as alternative forums such as arbitration. In addition, Mr. Adair has experience counseling clients on licensing agreements and a variety of business matters.

Prior to law school, Mr. Adair was a legislative assistant for a U.S. Representative. He handled transportation, environmental, agricultural, judicial, tax, and economic matters. As part of this work, Mr. Adair was involved in reforms to the nation's transportation infrastructure following 9/11.

REPRESENTATIVE EXPERIENCE

Mr. Adair's practice ranges across all aspects of the litigation process from pre-suit investigation through appeal. A few recent representative matters include:

- Represented a leading oil and gas services company in matters involving breach of contract and fraud allegations.
- Represented a leading banking services company against claims for breach of contract and fraud leading to a favorable resolution shortly before trial.
- Represented a large digital advertising distribution company in its suit claiming breach of certain covenants of an employment agreement and theft of trade secrets, which resulted in a large damages award and injunctive relief.
- Defended an internet company against unjust enrichment and fraudulent transfer claims in federal court, which resulted in an order dismissing all claims.
- Defended a foreign manufacturer against claims of trademark and copyright infringement as well as unfair competition, which included a favorable ruling from the 5th Circuit Court of Appeals.
- Counseled a software company and prepared licensing agreements.
- Represented hotel developers and owners against claims for breach of contract and fraud related to hotel sales, financing, and management, which resulted in favorable resolutions.
- Defended an architectural and design company against copyright infringement, breach of contract, and defamation claims resulting in a favorable resolution at mediation.

- Defended a major automobile manufacturer in multiple patent infringement suits, which ended with very favorable rulings and resolutions.

PRACTICE AREAS

- Commercial Disputes Litigation
- Energy & Natural Resources Litigation
- Trade Secret & Non-Compete Litigation
- Alternative Dispute Resolution
- Appellate Litigation
- Intellectual Property
- Licensing
- Domestic Arbitration/ADR

AWARDS & RECOGNITION

- Texas Super Lawyers - Rising Stars 2013

REPRESENTATIONS

- Contributing Author, From the Courtroom, to the Boardroom, to the Capitol, "Inside the Minds: Recent Trends in Patent Infringement Litigation," (Aspatore 2011)
- Co-Author, Texas Chapter of "Business Torts: A Fifty State Guide," 2007 and 2008 Editions; Daller, Editor-in-Chief

MEMBERSHIPS

- State Bar of Texas
- American Bar Association

EDUCATION

- J.D., with honors, University of Texas Law School
- Dartmouth College
- State of Texas
- State of New York
- Fifth Circuit Court of Appeals
- United States Court of Appeal for the Federal Circuit
- United States District Court for the Northern District of Texas
- United States District Court for the Southern District of Texas
- United States District Court for the Eastern District of Texas
- United States District Court for the Western District of Texas



Courtney E. Hawkins

713-634-3602 direct
832-865-0753 cell
CHawkins@pierceneill.com
[Download vCard](#)
[Download CV](#)

BIOGRAPHY

Courtney Hawkins represents plaintiffs and defendants in a broad range of complex commercial matters and personal injury matters in both state and federal courts. She has been with the firm since its inception.

Ms. Hawkins earned a B.A., with distinction, from the Louisiana Scholars' College at Northwestern State University in 1997 and a M.A. in English from Baylor University in 2001. She graduated, with highest honors, from The University of Texas School of Law in 2005, where she was an Articles Editor for the Texas Law Review, a member of the Order of the Coif, and the Clerk of Chancellors (3rd in her class). Prior to joining Pierce & O'Neill, Ms. Hawkins clerked for the Honorable Lee H. Rosenthal of the United States District Court for the Southern District of Texas and was previously associated with King & Spalding, LLP.

REPRESENTATIVE EXPERIENCE

- Obtained dismissal in federal court of case alleging ownership interest in defendant's oil and mineral leases;
- Successfully argued for and obtained temporary injunction for plaintiff alleging easement right in real estate dispute.
- Obtained a favorable settlement for plaintiff before permanent injunction hearing;
- Obtained favorable settlement for plaintiff alleging violations of the Texas Deceptive Trade Practices Act in connection with the purchase of high pressure water jetting systems;
- Obtained favorable settlement for defendant accused of violating the Texas Deceptive Trade Practices Act in connection with the provision of computer software;
- Ongoing representation of a corporate plaintiff in a dispute alleging breach of multiple assignment agreements;
- Ongoing representation of defendants in a case with numerous plaintiffs alleging personal injuries and claims of premises liability and negligence.

PRACTICE AREAS

- Commercial Disputes Litigation
- Trade Secrets & Non-Compete Litigation
- Energy Litigation
- Appellate Litigation

- Personal Injury Defense

MEMBERSHIPS

- State Bar of Texas
- Houston Bar Association

COURT ADMISSIONS

- Texas
- U.S. Court of Appeals 5th Circuit
- U.S. District Court Southern District of Texas
- U.S. District Court Western District of Texas

EDUCATION

- **The University of Texas School of Law, Austin, Texas**
 - J.D.
 - Honors: With Highest Honors
 - Honors: Order of the Coif
 - Honors: Clerk of Chancellors
 - Law Review: Texas Law Review, Articles Editor
- **Baylor University**
 - M.A.
- **Louisiana Scholars' College at Northwestern State University**
 - B.A.
 - Honors: With Distinction

PAST EMPLOYMENT POSITIONS

- Honorable Lee H. Rosenthal of the United States District Court for the Southern District of Texas, Clerk
- King & Spalding, LLP, Associate